

REMARKS

This Application has been reviewed in light of the Office Action mailed May 26, 2010. At the time of the Office Action, Claims 1-2, 4-6 and 8-10 were pending, and Claims 3 and 7 were previously cancelled. All pending Claims 1-2, 4-6 and 8-10 were rejected in the Office Action. Claims 1, 5, and 9 are herein amended. Applicants respectfully request reconsideration and allowance of all pending claims.

Rejections under 35 U.S.C. § 112

Claims 1-2, 4-6, and 8-10 were rejected by the Examiner under 35 U.S.C. §112, second paragraph, as being indefinite and failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention.

First, the Examiner alleges that “applicant states that the second part of the needle is joined to a coupling unit, however it appears the coupling unit is the assembly of components as a whole and instead the second part of the needle is joined to the coupling body (of the coupling unit).” Applicants respectfully disagree with this rejection. In the embodiment shown in Figure 1 and 2, the coupling unit 19 includes the coupling body 25 and the keeper 23. As shown in Figure 2, the second part 17 of the needle is connected to the coupling unit 19 by means of a welding seam between the second part 17 of the needle and coupling body 25. Thus, the second part 17 of the needle is, in fact, coupled to the coupling unit 19, and the relevant language of the claims is not indefinite. One of ordinary skill in the art would fully understand the relevant language of the claims, especially in view of Applicants’ specification and figures. The Examiner’s rejection is analogous to a rejection of a claim reciting “a wheel attached to a car” because the wheel includes a subcomponent -- *a rim* -- that is actually attached to the car. Accordingly, Applicants respectfully request that this rejection be withdrawn.

Second, the Examiner alleges that the language “such that keeper fits substantially tightly within the recess to substantially prevent any radial movement of the keeper and the needle relative to the needle” is unclear. Applicants have amended this language to recite “such that keeper fits substantially tightly within the recess to substantially prevent any radial movement of the keeper and the first part of the needle relative to the second part of the needle.” Accordingly, Applicants respectfully request that this rejection be withdrawn.

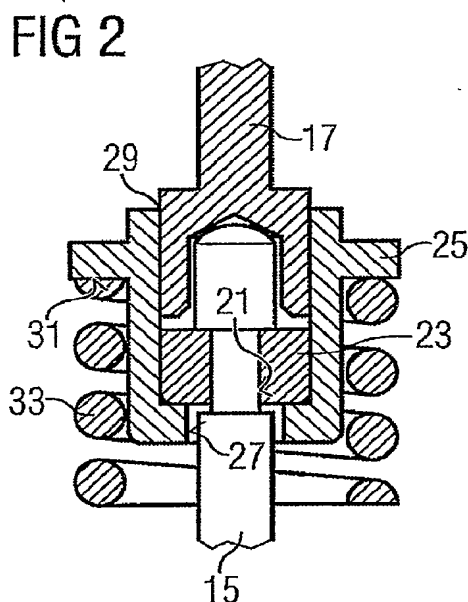
Amended Independent Claims 1, 5, and 9 are Allowable.

Independent Claims 1, 5, and 9 were rejected under 35 U.S.C. §102(b) as being anticipated by *Lambert* (U.S. Patent No. 6,260,775).

Although Applicants do not necessarily agree with these rejections, Applicants have amended independent Claims 1, 5, and 9 to further distinguish from *Lambert*. For example, amended Claim 1 recites in part:

wherein the recess has an inner diameter, the first part of the needle has an outer diameter smaller than the inner diameter of the recess such that the first part of the needle can pass through the recess, and the keeper has an outer diameter larger than the inner diameter of the recess such that the keeper cannot pass through the recess.

These limitations are shown, for example, in Applicants' Figure 2. The relative diameter sizes recited in the amended claims are important because they allow for the specific coupling technique taught in Applicants' disclosure -- specifically, that the first needle part 15 can be passed through the recess 27 in the coupling body 25, and then the keeper 23 can be inserted in the receptance 21 formed in the first needle part 15, wherein the keeper 23 is radially larger than the recess 27 such that the keeper 23 prevents the first needle part 15 from backing out of the recess 27.



Lambert does not teach the relative diameter sizes recited in the amended claims, because *Lambert* does not teach a coupling technique similar to Applicants' technique discussed above. For example, *Lambert* does not teach a recess having an inner diameter larger than the outer diameter of the alleged first needle part 20 but smaller than the outer diameter of the alleged keeper 18. Applicants remind the Examiner that "[a] claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987). Furthermore, "the identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co. Ltd.*, 868 F.2d 1226, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989). Clearly, *Lambert* does not teach "each and every element" or "the identical invention" recited in amended independent Claims 1, 5, and 9.

Thus, for at least the reasons set forth above, Applicants respectfully submit that Claims 1, 5, and 9 are allowable over *Lambert*. Accordingly, Applicants request reconsideration and allowance of independent Claims 1, 5, and 9, as well as all claims that depend therefrom.

All Dependent Claims are Allowable.

Dependent Claims 1-2, 5-6, and 9 were rejected by the Examiner under 35 U.S.C. §102(b) as being anticipated by *Lambert*.

Dependent Claims 4, 8, and 10 were rejected by the Examiner under 35 U.S.C. §102(b) as being anticipated by or, in the alternative, under 35 U.S.C. 103(a) as obvious over *Lambert*.

Applicants submit that all dependent claims are allowable at least because they depend from the independent claims shown above to be allowable. Thus, Applicants respectfully request reconsideration and allowance of all pending dependent claims.

CONCLUSION

Applicants have made an earnest effort to place this case in condition for allowance in light of the remarks set forth above. Applicants respectfully request reconsideration of the pending claims.

Applicants believe there are no fees due at this time. However, the Commissioner is hereby authorized to charge any fees necessary or credit any overpayment to Deposit Account No. 50-4871 of King & Spalding L.L.P.

If there are any matters concerning this Application that may be cleared up in a telephone conversation, please contact Applicants' attorney at 512.457.2030.

Respectfully submitted,
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